

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

NB:JJD:LTG/JLG F. #2018R00279

610 Federal Plaza Central Islip, New York 11722

September 13, 2019

## By Electronic Mail

Larry H. Krantz, Esq. lkrantz@krantzberman.com

Bradley Gershel, Esq. gershelb@ballardspahr.com

Lisa Cahill, Esq. lcahill@krantzberman.com

Alan M. Vinegrad, Esq. avinegrad@cov.com

Erin K. Monju, Esq. emonju@cov.com

Re: United States v. Christopher McPartland and Thomas J. Spota

Criminal Docket No. 17-587 (JMA)

## Dear Counsel:

Pursuant to the Court's September 12, 2019 Order, the government hereby provides the following names of individuals who have been identified, to date, as actual or potential government witnesses, and whose electronic files may be contained on the Suffolk County Department of Information Technology's "backup tapes" produced to the government in response to its June 6, 2018 subpoena *duces tecum*: <sup>1</sup>

Although the government presently anticipates calling only approximately 15 to 20 of the below witnesses in its case-in-chief, this list is intentionally over-inclusive, given that we are presently unaware of the identities of any defense witnesses and/or any specific



defenses to be advanced at trial. In light of that, additional witnesses may be necessary in either or both the government's direct and/or rebuttal case.



The information contained herein is being provided subject to the terms of the parties' Stipulations and Orders dated March 19, 2019 and March 29, 2019.

Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: <u>/s/</u>

John J. Durham Lara Treinis Gatz Justina L. Geraci Michael R. Maffei Assistant U.S. Attorneys (631) 715-7851/-7913/-7835

cc: Clerk of the Court (JMA) (by ECF) (redacted)